

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

REYNOLDS INNOVATIONS, INC.,)

Plaintiff,)

vs.)

Civil Action No. 1:11-CV-581

E-CIGARETTEDIRECT, LLC d/b/a)

"E-CIGARETTEDIRECT.COM";)

VEPPO, INC. d/b/a "E-)

CIGARETTEDIRECT" and)

"VEPPOCIG.COM"; SABINA KING,)

individually and d/b/a "E-)

CIGARETTEDIRECT.COM" and)

"VEPPOCIG.COM"; and MICHAEL)

KEITH KING, individually and d/b/a "E-)

CIGARETTEDIRECT.COM" and)

"VEPPOCIG.COM",)

Defendants.)

DEFENDANTS RESPONSE TO PLAINTIFF'S COMPLAINT

FILED 07/20/2011

In no manner did the Defendants intend to mislead consumers into believing that the Plaintiff endorses, is associated with, or authorizes any of the products on the websites.

Though the images used on the websites stated in this case are not under trademark infringement of the Camel brand, out of respect for the wishes of the Plaintiff, the supposed marks have been removed permanently from the sites and disclaimers added. Labeling on product has also been changed to not include any reference to the Camel brand.

We have no products or advertising materials that bear the Camel trademarks.

This the 22nd day of October, 2011.

/s/ Michael Keith King

Michael Keith King

P.O. Box 2741

Parker, CO 80134

Telephone: 303-872-8188

keithk@e-cigarette-direct.com

Representative for:

E-CigaretteDirect, LLC

Veppo, Inc.

Sabina King

CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing **Response to Complaint for Civil Action No. 1:11-CV-581** with the Clerk of the Court using The United States Postal Service Express Mail with required delivery signature.

I further certify that copies were electronically mailed on September 2, 2011 and are also being deposited with the U.S. Mail, first class, postage prepaid, addressed to:

William M. Bryner
KILPATRICK TOWNSEND & STOCKTON LLP
1001 West Fourth Street
Winston-Salem, NC 27101

This the 22nd day of October, 2011.

/s/ Michael Keith King

Michael Keith King
P.O. Box 2741
Parker, CO 80134
Telephone: 303-872-8188
keithk@e-cigarette-direct.com

Representative for:
E-CigaretteDirect, LLC
Veppo, Inc.
Sabina King